



Corporate Responsibility

P R O G R A M

A MISSION BASED ON VALUES AND ETHICS

Ascension Health, its Health Ministries, associates and agents are committed to carrying out their healthcare ministry in a manner consistent with the Ascension Health Mission, Vision and Values. We are dedicated to following a high ethical standard of individual conduct as well as acting as responsible corporate citizens. In support of these commitments, the Board of Trustees of Ascension Health has formally established a Corporate Responsibility Program to:

PROMOTE GOOD CORPORATE CITIZENSHIP

IDENTIFY HIGH-RISK AREAS

PREVENT AND DETECT ETHICAL VIOLATIONS

COMPLY WITH FEDERAL, STATE, AND LOCAL LAWS

This booklet contains information about the foundation of our Corporate Responsibility Program. It details the Mission, Vision and Values of Ascension Health; explains the Standards of Conduct we are responsible for practicing; and explains a confidential phone service available to report ethical and legal issues.

M I S S I O N

Rooted in the loving ministry of Jesus as healer, we commit ourselves to servicing all persons, with special attention to those who are poor and vulnerable. Our Catholic health ministry is dedicated to spiritually centered, holistic care that sustains and improves the health of individuals and communities. We are advocates for a compassionate and just society through our actions and our words.

Ascension Health

V I S I O N

We envision a strong, vibrant Catholic health ministry in the United States which will lead to the transformation of health care. We will ensure service that is committed to health and well-being for our communities and that responds to the needs of individuals throughout the life cycle. We will expand the role of the laity, in both leadership and sponsorship, to ensure a Catholic health ministry of the future.

V A L U E S

We are called to:

Service of the Poor generosity of spirit, especially for persons most in need

Reverence respect and compassion for the dignity and diversity of life

Integrity inspiring trust through personal leadership

Wisdom integrating excellence and stewardship

Creativity courageous innovation

Dedication affirming the hope and joy of our ministry

The following six Standards of Conduct are practical extensions of Ascension Health's Mission, Vision and Values. They more clearly state Ascension Health's expectations for how associates should conduct themselves

Standards of Conduct

to promote and protect the integrity of Ascension Health. Each associate is expected to act in a manner consistent with the standards on the following pages. As you read these standards, keep in mind that references to "Ascension Health" and "We" include all administrators, associates, medical staff members, leased associates and volunteers of Ascension Health and its Health Ministries.

QUALITY OF CARE

A central concern of Ascension Health in meeting patient needs is serving the whole person in his or her spiritual, intellectual, emotional and physical dimensions. Ascension Health is committed to providing competent and compassionate care, to respect and safeguard the dignity of the patient and to allow patients access to all the medical and ethical information necessary to make decisions about their care.

We treat the person rather than the disease.

We allow patients to participate in decisions regarding their care by providing them with access to information about their care in a manner that they can understand.

We respect and maintain the dignity of every patient and strive to provide care in a manner sensitive to cultural differences and individual desires.

We provide appropriate care based on the patient's medical need, without regard to race, religion, national origin, age, sex, disability, ability to pay or any classification protected by law.

We provide medically necessary care that is properly documented in the patient's medical record.

We maintain competencies related to our job responsibilities and exercise appropriate judgment and objectivity when providing patient care.

We report situations that compromise quality through the appropriate, established channels and correct such situations as soon as possible.

L A W S A N D R E G U L A T I O N S

Ascension Health will operate in accordance with all laws and regulations. These laws and regulations apply to areas such as patient referrals, employment, physician relationships, billing and payment practices, discount arrangements, lobbying, political contributions, the environment, health and safety and dealings with payors and regulatory agencies.

We refrain from any conduct that may violate federal or state laws, including those related to federal program fraud, abuse and false claims.

We prohibit any type of payment for or receipt of money or benefits for the purpose of inducing referrals in violation of the anti-kickback statute, Stark physician self-referral law or other federal or state statutes or regulations.

We recruit, hire, train, promote, assign, transfer, lay off, recall and terminate associates based on an evaluation of work performance, their own achievements, experience and conduct without regard to race, religion, national origin, age, sex, disability, ability to pay or any classification protected by law.

We provide associates with the necessary training and education to perform their duties in accordance with applicable laws and regulations.

We establish relationships only with those individuals or entities who have not been excluded from participation in federal healthcare programs.

We make certain that reports or other information required to be provided to any federal, state or local government agency are filed accurately and in conformance with the applicable laws and regulations to the best of our knowledge and understanding.

We do not engage in activities that jeopardize the tax-exempt status of the organization, including certain lobbying and political activities, or activities that further the private or personal interests of an individual rather than our charitable purpose. We refrain from activities that violate the antitrust laws.

We follow applicable environmental, health and safety requirements in the planning and operation of our facilities.

We report any practice or condition that we believe may violate laws, rules or regulations, safety standards, internal policies or Standards of Conduct to appropriate levels of management in a timely manner.

We take steps to ensure that our billing and coding are in compliance with our policies and with federal and state laws and regulations, and are supported by appropriate documentation, including the medical record.

L A W S A N D R E G U L A T I O N S

We create accurate and truthful patient bills and submit accurate claims for payment from any payer, including Medicare and Medicaid, commercial insurance or our patients. Not only is it the right thing to do, but federal and state laws require accuracy in healthcare billing.

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. “Knowingly” includes having actual knowledge that a claim is false, or acting in “deliberate ignorance” or “reckless disregard” as to whether a claim is false. Examples of possible false claims include billing Medicare for services that were not provided, billing for a higher-level service than the service actually furnished (upcoding) or billing for services that were not ordered by a physician.

Financial penalties to the organization for submitting a false claim can total as much as three times the amount of the claim plus fines of \$5,500 to \$11,000 per claim. In addition to fines and penalties, an individual or organization that violates the False Claims Act is subject to exclusion from participation in federally funded healthcare programs.

The False Claims Act contains provisions that allow individuals with original information (i.e., information not already the subject of legal proceedings or activities that have already been publicly disclosed) concerning fraud involving government programs to file a lawsuit on behalf of the government and, if the lawsuit is successful, to receive a portion of recoveries obtained by the government.

The federal False Claims Act protects an employee from being fired, demoted, threatened or harassed by his or her employer for providing information in good faith relative to a False Claims Act investigation or lawsuit.

The Program Fraud Civil Remedies Act (“PFCRA”)

provides federal agencies, including the agencies responsible for federally funded healthcare programs, with administrative remedies against individuals and organizations that knowingly submit a false claim for payment, or knowingly make or use a false record or statement to get a false claim paid. The PFCRA is limited to situations where a false claim, or a group of related false claims, does not exceed \$150,000. The PFCRA provides civil penalties up to \$6,000 per false claim, plus an assessment equal to twice the amount of the false claim.

In addition to the federal law, certain states have adopted a similar law that allows individuals or the State to file a lawsuit in state court for false claims filed with the state for payment, such as the Medicaid program. Your Corporate Responsibility Officer can describe the False Claims Act provisions applicable to your state.

Our Corporate Responsibility Program supports compliance with these federal and state laws by:

- Monitoring and auditing to prevent or detect errors in coding or billing.
- Educating our associates that they are responsible for reporting any concern about a possible false claim.
- Investigating all reported concerns and correcting any billing errors discovered.
- Protecting our associates who report concerns in good faith.

HUMAN RESOURCES

Ascension Health strives to cultivate a work environment where associates are highly regarded; where they are treated honestly and respectfully; where their health and safety are protected; where they are motivated to reach their potential; where they are given the opportunity for personal and career learning and advancement; where they are provided with opportunities to participate in decisions that affect their working conditions; where they are provided with the tools necessary to do their jobs well; where there are safe and adequate procedures for resolving conflicts; and where associates are recognized and rewarded for their achievements, without prejudice or discrimination.

We do not tolerate any form of harassment or discrimination.

We seek to be a responsible employer by providing opportunities for professional satisfaction, pride of work and career growth.

We keep associates informed of activities and events that affect their specific work environment and performance of their job duties.

We provide training opportunities for associates to assist them in obtaining and maintaining certifications or licensures necessary for the performance of their job duties.

We maintain a drug free workplace and will not tolerate the use or possession of illegally acquired drugs and/or alcoholic substances while associates are on duty.

We function in an environmentally responsible manner, providing for the health and safety of our associates as well as our patients and the community.

We provide a grievance process to report and resolve conflicts without fear of retribution.

The information provided above does not encompass all Human Resource Policies and Procedures. A copy of the Human Resources Policies and Procedures Manual is available from the Health Ministry's Human Resources Department.

BUSINESS AND ETHICAL PRACTICES

Ascension Health is committed to ethical business conduct and integrity, including the *Ethical and Religious Directives for Catholic Health Care Services*. Associates must represent Ascension Health accurately and honestly and must not do anything that purposely defrauds anyone, including other companies or the government, of money, property or services. Record keeping and billing for services provided to patients must be accurate, timely and lawful. Associates must take all reasonable steps to preserve and protect Ascension Health's assets by making prudent and effective use of its resources, and properly and accurately reporting its financial condition.

We do not engage in unethical or illegal activities in the pursuit of business opportunities.

We act in good faith and in the best interest of Ascension Health at all times in the performance of our job duties.

We appropriately document the care that is provided.

We submit claims only for medically necessary services and supplies ordered by a physician or legally authorized individual and provided to the patient.

We do not steal or misappropriate confidential or proprietary information belonging to another person or entity.

We use resources and assets only to further the Ministry and Mission of Ascension Health.

We do not use "insider" information for any business activity conducted by or on behalf of Ascension Health or its Health Ministries.

We do not offer, give, solicit or receive any form of bribe, kickback or other improper gift or payment.

We make certain that payments and other transactions are properly authorized by management and properly documented in the books and records.

We prepare all financial documents, including financial statements, cost reports, accounting records, expense reports and time sheets accurately.

We deal with payors and regulatory agencies honestly and accurately.

CONFIDENTIALITY

In keeping with the Health Insurance Portability and Accountability Act (HIPAA), professional ethical guidelines and the *Ethical and Religious Directives for Catholic Health Care Services*, Ascension Health associates must maintain the privacy and security of protected health information, including demographic information that can be used to identify the patient. Associates are also expected to keep confidential information about other associates and the proprietary business practices of the organization.

We protect and respect the confidentiality of our patients and their medical information.

We only reveal personal or confidential information concerning patients for legitimate patient care purposes, unless authorized by the patient or otherwise permitted by law.

We only share confidential information regarding the operations of Ascension Health or its Health Ministries with associates when they have a legitimate need to know the information in order to perform their job responsibilities.

We will take precautions to maintain and manage intellectual property, including patents, trademarks, copyright and software, to protect its value.

We will maintain confidential information, including financial data and associate related information, in a confidential, secure manner according to relevant policies and applicable law.

CONFLICTS OF INTEREST

Ascension Health associates are expected to act in a manner that is in the best interest of the organization and the patients it serves. Associates may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. In any situation where an associate's outside interests conflict with those of the organization, the associate must disclose the conflict in accordance with organizational policy.

We avoid engaging in any activity, practice or act that appears to conflict with the interests of Ascension Health.

We do not solicit or accept money, gifts, favors, services, entertainment or other things of value unless permitted by organizational policy.

We abstain from any decision or discussion affecting Ascension Health that might represent a conflict of interest when serving as a member of an outside organization or board.

We do business only with individuals and companies based on the best interests of Ascension Health.

We will avoid any appearance of impropriety when dealing with clinicians and referral sources.

We prohibit the disclosure of proprietary and confidential information related to Ascension Health to any unauthorized person or entity, or the use of such information for private benefit.

We avoid outside employment, consulting arrangements or personal investments if they interfere with our job responsibilities or unduly influence the decisions we are required to make on behalf of Ascension Health.

We may face circumstances that can leave us wondering which path to take, which choice to make and how to make it. This is particularly true when we are confronted with challenges to our ethical and legal standards. Who can we ask for help?

Values Line

A CONFIDENTIAL RESOURCE FOR COMMUNICATING YOUR

As responsible associates, it is our right and duty to talk with our supervisors about any situation that we believe may potentially violate laws or the Ascension Health Standards of Conduct. It isn't a question of betraying confidence. It's a question of the continued respect and viability of our organization and professional responsibilities.

The Corporate Responsibility Officer is an individual in your organization that has overall responsibility for the Corporate Responsibility Program. If speaking with your supervisor or the Corporate Responsibility Officer is not the best avenue for you, we have established the Values Line.

What is the Values Line? The Values Line is an additional means of communication available to all Ascension Health associates. You can call this toll-free

telephone service 24 hours a day, seven days a week, or use the internet to report information you may have regarding a possible violation of laws or our Standards of Conduct.

What kinds of violations should I report? In your work you may observe actions that appear to be illegal, unethical or violate our Standards of Conduct. These actions should be reported because of the potential consequences for our organization. The following are examples of situations that should be reported:

- Discrimination/Harassment
- Dishonest Communication
- Violations of Patient/Associate Confidentiality
- Conflicts of Interest
- Inappropriate Gifts, Entertainment and Gratuities
- Stealing or Misuse of Assets

- Fraud, Abuse or False Claims
- Environmental, Health and Safety Violations
- Improper Use of Proprietary Information
- Inappropriate Use of Ascension Health Resources for Lobbying/Political Activities
- Business arrangements that promote improper referrals

What happens when I call the Values Line?

Your call to the Values Line is answered by a trained Communications Specialist who takes hand-written notes as you describe your concern. Questions may be asked of you to gather additional information. At the close of the call, you receive a unique identification number and a specific date to call back to check on the status of your concern.

Do I have to give my name? No. The Values Line is a confidential resource provided to you for disclosing information about potential ethical and legal violations. However, we encourage you to leave your name as that often helps us with our investigation.

What if I don't know all of the details? You can report anything that concerns you. Even if your information is incomplete, it could help keep a serious situation from developing.

Are calls ever recorded or traced? No. Call tracing and recording devices are never used.

What happens after I call? The Communications Specialist prepares a confidential report based on the information you provide. The report is forwarded to your Corporate Responsibility Officer for review, investigation and, when appropriate, corrective action. The results of the investigation will be provided to the Communications Specialist so they may be given to you during your follow-up call.

Do I have to call during normal business hours?

No. The Values Line is available to take your call any time of day or night, any day of the week.

How do I use the internet to report a concern? The web site is www.AscensionHealthValuesLine.org. Once you connect to the web site, there is a series of screens that walk you through the process of preparing and submitting a report. After you submit a report, you will be provided a follow-up date, report number and PIN.

Will I suffer any retaliation from my organization or Ascension Health for making a report? No. You should feel comfortable providing information about possible legal or ethical violations to the Values Line without fear of retribution. We can assure you that no adverse action will be taken against you by our organization or Ascension Health based on a good faith complaint.

Conclusion

Our Mission, Vision and Values, along with our Standards of Conduct and Values Line provide the foundation for our Corporate Responsibility Program. If you need guidance concerning any information in this booklet or you believe you are aware of a situation that may be illegal or unethical, you are expected to take action. As a first step, you are encouraged to talk to your supervisor or manager. If you are uncomfortable with going to your supervisor or if you need additional advice, then contact the Corporate Responsibility Officer for your Health Ministry, call the Values Line or visit our web site to make a confidential report.

As evidence of your commitment to the Ascension Health Standards of Conduct and Corporate Responsibility Program, please detach the Receipt and Acknowledgment form at the perforated line and sign and complete the form.

Please return this form to your supervisor. This lets us know we are all committed to carrying out the ministry of Ascension Health in an ethical and legal manner.

RECEIPT AND ACKNOWLEDGEMENT

As an associate or agent employed by or associated with an Ascension Health Health Ministry, I am committed to upholding the highest standard of individual ethical and legal business practices. I will not tolerate illegal or questionable activity and promise to take whatever steps are required by the Corporate Responsibility Program to identify, report and prevent such activity.

I acknowledge that I have received my personal copy of the Standards of Conduct and agree to follow them. I understand that compliance with the Standards of Conduct and the Corporate Responsibility Program is a condition of my continued employment or association with Ascension Health.

Signature

Print Name

Ascension Health Health Ministry

Date

Values Line

A MISSION BASED ON VALUES

Please remove and save the **Values Line wallet card** attached to the back cover of this booklet. It fits easily into your purse or wallet. Carry it as a reminder of your responsibility to report any problems or concerns. Call the confidential, toll-free telephone number anytime, or visit our web site to discuss your ethical concerns or to report a possible violation of law or our Standards of Conduct.

Call the toll-free, confidential Values Line 24 hours a day, seven days a week, or visit the web site to discuss these and any other issues concerning you:

discrimination/harassment; dishonest communication; violations of patient/associate confidentiality; conflicts of interest; inappropriate gifts, entertainment and gratuities; stealing or misuse of assets; fraud, abuse or false claims; environmental, health and safety issues; improper use of proprietary information; inappropriate use of Ascension Health resources for lobbying/political activities

VALUES LINE
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